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September 18, 2020

By ECF

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Ivezaj v. United States*, 20-cv-4889-DLC (S.D.N.Y.)
Rudaj v. United States, 11-cv-1782-DLC (S.D.N.Y.)
Dedaj v. United States, 11-cv-1510-DLC (S.D.N.Y.)
Colotti v. United States, 11-cv-1402-DLC (S.D.N.Y.)
DiPietro v. United States, 11-cv-1556-DLC (S.D.N.Y.)
United States v. Rudaj et al., 04-cr-1110-DLC (S.D.N.Y.)

Dear Judge Cote:

We respectfully submit this letter on behalf of Prenka Ivezaj, Alex Rudaj, Nikola Dedaj, Nardino Colotti, and Angelo DiPietro (the "Petitioners") to request a two-week extension of Petitioners' due date and modification of the unified briefing schedule in the above § 2255 proceedings, resulting from the criminal case of *United States v. Rudaj et al.*, 04-cr-1110-DLC (S.D.N.Y.). The Government joins this request.

Under the Court's original joint briefing schedule, the Petitioners' briefs are due on September 21, 2020. Since the setting of that schedule, the Petitioners and the Government have engaged in repeated discussions regarding the potential resolution of some of the common issues in the cases prior to briefing. Although no resolution has been reached, discussions are continuing, and it would be beneficial to have two weeks of additional response time for all parties. Thus, the parties jointly propose the following modified schedule:

October 5, 2020: Petitioners' opening brief
December 3, 2020: Government's response brief
December 17, 2020: Petitioners' reply

As the Petitioners were not initially on a joint schedule, this is the first extension request for some of the Petitioners (including Nardino Colotti) and the second extension request for others.

Respectfully submitted,

/s/

Eunice C. Lee
Counsel for Nardino Colotti

cc (via email):

Lara Pomerantz
Jonathan Rebold
United States Attorney's Office

David Patton
Edward Zas
Counsel for Alex Rudaj and Nikola Dedaj

Anthony DiPietro
Counsel for Angelo DiPietro

Michael Schachter
Counsel for Prenka Ivezaj

Granted. The proposed schedule governs.

Dated: September 18, 2020



DENISE COTE

United States District Judge